



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

ALEXANDRA CORSI  
*Senior Counsel*  
(212) 356-3545  
(212) 356-3509 (fax)  
acorsi@law.nyc.gov

May 31, 2023

**By ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Lachlan Cartwright v. City of New York, et al.*, 22-cv-07198 (NRB)

Your Honor:

I am a Senior Counsel in the New York City Law Department and the attorney for defendants in this action. Plaintiff's counsel, Gideon Oliver, and I submit this joint letter to respectfully request an additional 45 days, from June 1, 2023 to July 15, 2023, for the parties to attempt to resolve attorney's fees, costs and expenses.

At this juncture, the City has received a copy of Plaintiff's billing records and expenses, and has analyzed same; the City, however, has not yet been able to convey an offer to resolve attorney's fees, costs, and expenses but anticipates being able to do so later this week. Counsel for the parties sincerely apologize for the delay but assure the Court that once the undersigned receives authority and conveys an offer to Plaintiff, we will work diligently and expeditiously to attempt resolve this final issue. To the extent the parties are unable to resolve this issue within the next 45 days, the parties respectfully submit that they can provide the Court with a status update by July 15, 2023 and submit a proposed briefing schedule for any necessary motion practice.

For the reasons set forth above, the parties respectfully request an additional 45 days, until July 15, 2023, to attempt to resolve attorney's fees, costs and expenses. The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/ *Alexandra Corsi*

Alexandra Corsi

Cc: Gideon Oliver, Esq. (By ECF)